

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN PLYLER,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	
WHIRLPOOL CORPORATION,)	NO. 08-CV-6637
)	
Defendant.)	
)	

SUBMISSION OF JOINT VOIR DIRE QUESTIONS

COMES NOW, both parties and jointly propose that the Court give the following *voir dire* questions in addition to Judge Brown's standard *voir dire*.

1. Do any of you currently own a Whirlpool appliance? (Whirlpool makes appliances under the following major brand names: Whirlpool, Maytag, JennAir, KitchenAid, Estate, Roper, and Magic Chef, in addition to some Kenmore-brand products)
2. Has anyone had a bad experience with a Whirlpool appliance that would prevent you from fairly and impartially considering the evidence in this case against Whirlpool?
3. Does anyone have a close friend or family member who has had a bad experience with a Whirlpool appliance that would prevent you from fairly and impartially considering the evidence in this case against Whirlpool?
4. Have you or anyone in your immediate family worked for Whirlpool or any other appliance manufacturer or a company that supplies parts to them?
5. If so, do you feel that this would prevent you from fairly and impartially considering the evidence in this case against Whirlpool?
6. Have you ever used any type or brand of household appliance that had a defect?
7. If the answer to the last question is yes: what did you do about it?

8. Do you know if the problem with the appliance was ever attributed to the manufacturer?
9. Have you ever had a home appliance or any other product that was recalled?
10. If so, how did you learn that the product had been recalled?
11. Are you familiar with Post-Traumatic Stress Disorder?
12. Have you or anyone in your immediate family been diagnosed with Post-Traumatic Stress Disorder (PTSD)?
13. Do you know anyone who has been diagnosed with the disorder?
14. If so, have you or the person with it received treatment for it?
15. Has anyone served in the military?
16. Does anyone work in the field of medicine?
17. Does anyone have any experience or training in the field of psychiatry, mental health treatment, psychology or counseling?
18. Based on everything you have heard about the case thus far, is there anyone who does not feel that they can be a fair or impartial juror for this matter?

This 17th day of February, 2012.

FOR THE PLAINTIFF:

/s/ Scott Skaletsky
SCOTT SKALETSKY
Molzahn, Rocco, Reed & Rouse
20 North Clark Street
Suite 2300
Chicago, IL 60602
312-917-1880
SS@M3RLaw.com

WHIRLPOOL CORPORATION

By: /s/ Michael D. Hostetter

One of Its Attorneys

Michael D. Hostetter (*Pro Hac Vice*)

NALL & MILLER, LLP

235 Peachtree Street, NE

Suite 1500 – North Tower

Atlanta, Georgia 30303

(04)522-2200

mhostetter@nallmiller.com